

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

ELLAINA FAISON	)	Civil Action No. 1:24-cv-00556-WO-
	)	JEP
Plaintiff,	)	
	)	
vs.	)	
	)	
LABORATORY CORPORATION OF AMERICA	)	<b><u>DEFENDANT'S MOTION FOR SUMMARY</u></b>
HOLDINGS, doing business as	)	<b><u>JUDGMENT</u></b>
LabCorp,	)	
	)	
Defendant.	)	
	)	

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Defendant Laboratory Corporation of America Holdings, doing business as LabCorp ("Defendant" or "Labcorp"), by and through its undersigned counsel, hereby respectfully moves for summary judgment against Plaintiff Ellaina Faison's ("Plaintiff") claims, pursuant to Rule 56 of the Federal Rules of Civil Procedure. As explained more fully in the accompanying Memorandum of Law in Support of Defendant's Motion for Summary Judgment, there are no disputes of material fact and Labcorp is entitled to judgment as a matter of law with respect to Plaintiff's causes of action against Labcorp for (1) discrimination in violation of the Americans with Disabilities Act of 1990 ("ADA"); (2) failure to accommodate under the ADA; (3) discrimination on the basis of race in violation of Title VII of the Civil Rights Act of 1964 ("Title VII") and (4) retaliation in violation of the ADA.<sup>1</sup>

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<sup>1</sup> Plaintiff failed to plead numbered causes of Action in the Complaint, thus these causes of actions are those that can be reasonably construed from the Complaint.

In further support of this Motion, Labcorp offers the applicable statutory and case law, the pleadings in this case, arguments of counsel, and any memoranda or other materials which Labcorp may file with the Court at or before a hearing on this matter, including but not limited to the accompanying Memorandum of Law in Support of this Motion for Summary Judgment along with the declarations and exhibits attached thereto.

Respectfully submitted, this 25th day of March, 2025.

/s/ M. Claire Healy

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Defendant's Motion for Summary Judgment was served upon the parties in this action by the Court's electronic ECF filing system.

This the 25th day of March, 2025.

/s/ M. Claire Healy

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